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Of Attorneys for Defendants Zuru, LLC, and
Nicholas Mowbray, individual; and Zuru, Inc.
and Zuru, Ltd. (Hong Kong); and Zuru, Ltd.
(New Zealand)

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

ZING TOYS, INC., an Oregon corporation,

Plaintiff,

vs.

ZURU, LLC, an Oregon limited liability company, ZURU LIMITED (Hong Kong), ZURU LIMITED (New Zealand), ZURU, INC., ANNA JANE MOWBRAY, an individual; MATTHEW PETER MOWBRAY, an individual; and NICHOLAS JAMES MOWBRAY, an individual; and JOHN DOES 1 – 10,

Defendants

Case No. CV10-863-MO

**ZURU, LTD'S (NEW ZEALAND)
MOTION TO DISMISS PURSUANT TO
Fed. R. Civ. P. 12(b)(2).**

Request for Oral Argument

LR 7(a) CERTIFICATION

The parties have made a good faith effort through telephone conferences to discuss the issues in the motions, presented below, and to attempt to resolve their disputes but have been unable to do so.

ZURU, LTD.'S (NEW ZEALAND) MOTION TO DISMISS FOR LACK OF PERSONAL

JURISDICTION

(Fed. R. Civ. P. 12(b)(2))

QUESTION TO BE DECIDED

Is Zuru, Ltd., a New Zealand company with no contacts with the United States, subject to personal jurisdiction in this matter?

MOTION

Zuru, Ltd. (New Zealand), a non-U.S. company, is being required to defend itself in a forum country with which it has no contacts and in a matter in which it has taken no action. As such, Zuru, Ltd. (New Zealand) respectfully moves the Court for dismissal due to lack of personal jurisdiction. This motion is supported by Fed. R. Civ. P. 12(b)(2) the *Legal Memorandum in Support of Zuru, Ltd.'s (Zew Zealand) Motions to Dismiss*, and the *Declaration of Matthew Mowbray*, filed herewith.

DATED this 21st day of December, 2010.

THE GRIFFIN LAW GROUP

s/ Philip S. Griffin

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Of attorneys for Zuru, LLC

CERTIFICATE OF SERVICE

I certify that on the 21st day of December, 2010, the foregoing **ZURU, LTD'S (NEW ZEALAND) MOTION TO DISMISS PURSUANT TO Fed. R. Civ. P. 12(b)(2)** was filed electronically. Notice of this filing will be sent to all other counsel by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/ Philip S. Griffin

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